

## UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 14-MJ-1047 (JSM)

YUSRA ISMAIL

## CRIMINAL COMPLAINT

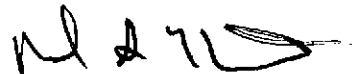
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about August 21, 2014, in Hennepin County, in the State and District of Minnesota, defendant did willfully and knowingly use, or attempt to use, a passport issued or designed for use by another,

in violation of Title 18, United States Code, Section(s) 1544.

I further state that I am a(n) Task Force Officer and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Complainant's signature

Michael Honeycutt, T.F.O., FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/2/14

City and state: Minneapolis, MN



Judge's signature

The Honorable Janie S. Mayeron

U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
District Court File No. 14-MJ- 1047 (JSM)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	<b>AFFIDAVIT OF MICHAEL S.</b>
	)	<b>HONEYCUTT</b>
vs.	)	
	)	
YUSRA ISMAIL,	)	
	)	
Defendant.	)	

I, Michael S. Honeycutt, being first duly sworn, hereby depose and state as follows:

STATE OF MINNESOTA	)	
	)	ss.
COUNTY OF HENNEPIN	)	

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Task Force Officer with the Federal Bureau of Investigation, and have been since August 5, 2013. I am a licensed Peace Officer in the state of Minnesota and have been a Minneapolis Police Officer for over five years. In that time I have investigated numerous cases involving felony assaults and other crimes. I have a bachelor's degree in criminal justice and have completed the Minneapolis Police Department Recruit Training Academy and the FBI Joint Terrorism Task Force Officer Operations Course where I received numerous hours of training in legal process, investigations, and evidence collection.

2. As part of my duties as a Task Force Officer, I investigate, among other things, criminal violations relating to terrorism, such as material support to designated foreign terrorist organizations. The statements contained in this affidavit are based on information I have learned through my own investigation; my background, training, and experience as a Task Force Officer assigned to the JTTF; the investigation of other FBI special agents and law enforcement officers; records and other evidence obtained during the course of this investigation; and discussions with individuals as set forth in this affidavit.

3. This affidavit has the limited purpose of demonstrating that there is probable cause to believe that the defendant, YUSRA ISMAIL, has committed a federal crime. It does not set forth all of my knowledge about this matter.

#### **PURPOSE OF THE AFFIDAVIT**

4. I make this affidavit in support of an application for a criminal complaint charging the defendant, YUSRA ISMAIL, Misuse of Passport, in violation of Title 18, United States Code, Section 1544. This affidavit is also made in support of an application for a warrant to arrest defendant YUSRA ISMAIL.

#### **FACTS CONSTITUTING PROBABLE CAUSE**

5. FBI Minneapolis is investigating numerous individuals who have traveled or are attempting to travel from the Twin Cities to Syria in order to involve themselves in the fighting that has consumed Syria for more than three years. Through the course of this investigation, the FBI learned that the defendant YUSRA ISMAIL has departed the United States using a stolen passport and likely traveled to Syria.

6. Your affiant has learned that on August 25, 2014, an adult female ("Victim 1"), who is a citizen of the United States, filed a report with the Minneapolis Police alleging that her passport had been stolen by the defendant YUSRA ISMAIL ("ISMAIL"). In a subsequent interview, Victim 1 described how on August 18, 2014, ISMAIL had called her unexpectedly and asked to meet. Shortly after arriving at Victim 1's apartment, ISMAIL asked to see Victim 1's passport. ISMAIL explained to Victim 1 that she was planning to travel to Africa for a wedding. Victim 1 showed ISMAIL her passport and by doing so revealed to ISMAIL where Victim 1 kept her passport. Later on the 18th, ISMAIL asked to use the restroom in Victim 1's apartment, which was in the vicinity of the room where Victim 1 was storing her passport. Shortly after returning from her purported use of the restroom, ISMAIL told Victim 1 that she needed to leave.

7. The next day, Victim 1 received a text message from ISMAIL in which ISMAIL apologized if she had ever had harmed Victim 1. Several days later, upon hearing from ISMAIL's friends that ISMAIL had traveled overseas using another person's passport, Victim 1 checked the location in her apartment where she had been storing her passport and discovered that her passport was now missing. She then called the Minneapolis Police.

8. Your affiant has reviewed documents provided by Delta Airlines which shows that Victim 1's passport was indeed used by an individual believed to be ISMAIL on August 21, 2014, to travel on a Delta flight from the Minneapolis/St. Paul International Airport to Amsterdam, the Netherlands. The same passenger then traveled

from Amsterdam to Oslo, Norway, arriving on August 22, 2014. No further travel records beyond Norway are currently available.

9. Witness 1 has provided information about defendant ISMAIL's departure from the Twin Cities. Witness 1 stated that on or about August 21, 2014, Witness 1 received a phone call from ISMAIL asking for a ride to the Minneapolis/St. Paul International Airport. Witness 1 picked up ISMAIL and took her directly to the airport that same day. Witness 1 observed ISMAIL with a passport in her possession but did not see the name on the passport.

10. Witness 2 has provided information to investigators about a message she received from ISMAIL shortly after ISMAIL's disappearance from the Twin Cities in August of 2014. In this message, ISMAIL admitted that she had used another female's passport to travel overseas without the passport holder's knowledge.

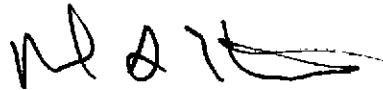
11. Your affiant has learned that on August 24, 2014, ISMAIL contacted members of her family via a messaging application, telling one or more of them that she was now in "Sham", a term commonly used to describe the area within Syria and Iraq where the Islamic State of Iraq and Syria ("ISIS") is attempting to establish a caliphate.

12. Your affiant knows that ISMAIL has not applied for a passport under her real name. Indeed, because ISMAIL is not a United States citizen, she cannot obtain a U.S. passport. Your affiant further knows that the ticket booked under Victim 1's name had a return date of September 1, 2014, and there is no record that any traveler has returned to the United States using this ticket. Further, there is no evidence that ISMAIL has since lawfully returned to the United States.

**CONCLUSION**

13. Based on the foregoing, I respectfully submit to this Court that there is evidence amounting at least to probable cause to believe that ISMAIL committed the federal crime specified above in this affidavit, and that the nature of this crime combined with other facts and circumstances further supports the issuance of a warrant by this court for the arrest of YUSRA ISMAIL.

Respectfully submitted,



MICHAEL S. HONEYCUTT  
Task Force Officer  
Federal Bureau of Investigation

Subscribed and sworn to before me

on this 2d day of December, 2014.



JANIE S. MAYERON  
United States Magistrate Judge